



FLORENCE COPPER INC.

1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

August 31, 2020

Nancy Rumrill
Water Division
U.S. Environmental Protection Agency
Region IX (STR-4-2)
75 Hawthorne Street
San Francisco, CA 94105

RE: Well Maintenance Proposal

Florence Copper is investigating the use of carbon dioxide or CO₂ as part of its well maintenance program. Introducing CO₂ at specific depths into the well can physically break up the precipitate that builds up on the well casing and in the screened interval during rinsing activities.

We have reviewed the permit conditions with regards to this maintenance activity, and have made the following interpretations:

- Part II.C.10 Proposed Changes and Work-overs: This maintenance activity does not meet the definition of a well work-over, and therefore the reporting and demonstration requirements in this part do not apply.
- Part II.E.4.a. Injection Pressure Limitation: The injection pressure limitation is not a factor in this maintenance activity, because the casing will not be pressurized. The well head will be open and the CO₂ will be introduced at specific depths.
- Part II.E.6.f. Injectate Fluid Limitations: The requirement under this part is not applicable as the use of CO₂ does not meet any of the three categories listed that would require the Director's Approval for a process chemical.

Florence Copper is requesting approval from the EPA to add this activity to its well maintenance program.

Please contact me at 520-316-3710 if you have any questions.

Sincerely,
Florence Copper, Inc.

A handwritten signature in blue ink, appearing to read 'Brent Berg', with a long horizontal flourish extending to the right.

Brent Berg
General Manager

cc: Maribeth Greenslade, ADEQ